

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

H.D. YORSTON, on behalf of himself and)
all others similarly situated,)
)
)
Plaintiff,)
)
)
v.) Civil Action No. 1:05-CV-10166 (PBS)
)
)

EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
)
)
Defendants.)
)

ROBERT GREENE, individually and on)
behalf of all others similarly situated,)
)
)
Plaintiff,)
)
)
v.) Civil Action No. 1:05-CV-10194 (WGY)
)

EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
)
)
Defendants.)
)

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**MOTION TO CONSOLIDATE ACTIONS TO BE
APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

JOHN C. JOHNSON, JR., JOHN C.)
JOHNSON JR. TARGET BENEFIT)
PENSION, JEFFREY S. JOHNSON, and)
JOHN C. JOHNSON JR. DEFINED)
BENEFIT PENSION PLAN, individually)
and on behalf of all others similarly)
situated,)
Plaintiff,)
v.)
EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
Defendants.)

DORAVILLE MANAGEMENT II CORP.,)
BY DONALD RAMIREZ, PRESIDENT,)
on behalf of himself and all others similarly)
situated,)
Plaintiff,) Civil Action No. 1:05-CV-10272 (GAO)
v.)
EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
Defendants.)

[Captions continued on next page]

STANLEY A. KIM, on behalf of himself)
and all others similarly situated,)
)
)
Plaintiffs,)
)
)
v.) Civil Action No. 1:05-CV-10315 (PBS)
)
)

EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
)
)
Defendants.)
)

YALE TOLWIN, on behalf of himself and)
all persons similarly situated,)
)
)
Plaintiffs,)
)
)
v.) Civil Action No. 1:05-CV-10388 (PBS)
)

EPIX PHARMACEUTICALS, INC.,)
MICHAEL D. WEBB, PEYTON J.)
MARSHALL, and ANDREW)
UPRICHARD,)
)
)
Defendants.)
)

PLEASE TAKE NOTICE that class member Oklahoma Firefighters Pension & Retirement System (“Oklahoma Firefighters”) by their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order: (I) consolidating for all purposes the above-captioned related actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing Oklahoma Firefighters as lead plaintiff; (iii) approving Oklahoma Firefighters’ selection of the law firm of Schiffrin & Barroway, LLP to serve as lead counsel; (iv) approving Oklahoma Firefighter’s selection of the law firm of Gilman and Pastor, LLP to serve as liaison counsel; and (v) granting such other and further relief as the Court may deem just and proper. In support of this motion, Oklahoma Firefighters submit herewith a memorandum of law and declaration of David Pastor.

Dated: March 28, 2005

Respectfully submitted,

GILMAN AND PASTOR, LLP

/s/ David Pastor

David Pastor (BBO #391000)
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999 Broadway, Suite 500
Saugus, MA 01906
Telephone: (781) 231-7851

Proposed Liaison Counsel

SCHIFFRIN & BARROWAY, LLP
Stuart L. Berman
Sean M. Handler
Robin Winchester
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706

Proposed Lead Counsel